

BAKER BOTTS L.L.P.

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Counsel for Defendants
Chicago Bridge & Iron Company N.V.,
Philip Asherman, Ron Ballschmiede and
Westley Stockton

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE CHICAGO BRIDGE & IRON)	CASE NO. 1:17-CV-1580 Hon. Lorna Schofield
COMPANY N.V. SECURITIES)	
LITIGATION)	
)	

**MEMORANDUM OF LAW IN SUPPORT OF DEFENDANTS'
MOTION *IN LIMINE* NO. 9**

Defendants Chicago Bridge & Iron Co. N.V. ("CB&I"), Philip K. Asherman, Ronald A. Ballschmiede, and Westley S. Stockton submit this Memorandum of Law in support of their Motion *in Limine* No. 9 to preclude any reference to any claim, allegation, or prayer of Plaintiffs not specifically pleaded.

The allowance of testimony concerning such unpleaded claims would operate as a prejudice to Defendants and would hinder their ability to obtain a fair trial. FED. R. EVID. 403.

Dated: December 13, 2021

Respectfully submitted,

BAKER BOTTS L.L.P.

By: /s/ David D. Sterling

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